

# EXHIBIT I

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*Plaintiffs and the Proposed Class*

*[Additional counsel included below]*

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

Richard Kadrey, et al.,

*Individual and Representative Plaintiffs,*

v.

Meta Platforms, Inc.,

*Defendant.*

Case No. 3:23-cv-03417-VC

**PLAINTIFFS' THIRD SET OF REQUESTS  
FOR ADMISSIONS TO DEFENDANT  
META PLATFORMS, INC.**

Pursuant to Rule 36 of the Federal Rules of Civil Procedure, Plaintiffs, by and through their undersigned attorneys, hereby request that Defendant Meta admit or deny, separately and in writing under oath, each of the matters set forth in this Third Set of Requests for Admissions within fourteen (14) days of service hereof, in accordance with the following definitions and instructions.

### **DEFINITIONS**

As used herein, the following words, terms, and phrases—whether singular or plural, or in an alternate verb tense—shall have the meanings ascribed below. Defined terms may not be capitalized or made uppercase. The given definitions apply even if a term in question is not capitalized or made uppercase. No waiver of a definition is implied by the use of a defined term in a non-capitalized or lowercase form:

1. “All,” “Or,” and “And” should be understood to include and encompass “any”; “or” should be understood to include and encompass “and”; and “and” should be understood to include and encompass “or.”

2. “Acsm Collection” means the portion of the Internet Archive Dataset identified by torrent files with “acsm” in the torrent file name, or any part of it.

3. Amazon S3 refers to Amazon Simple Storage Service.

4. Amazon S3 Bucket refers to a storage location on Amazon S3.

5. “Anna’s Archive” means the means the Dataset of textual works of that name available at <https://annas-archive-org>, or any part of it, including LibGen, Sci-Hub, Z-Library, the [Internet Archive](#), Duxiu, and [HathiTrust](#).

6. “AWS” means Amazon Web Services and the platform, software, servers and technical services it provides or has provided to Meta.

7. “AWS Virtual Computers” means cloud-computing EC2 instances that Meta used for Torrenting Datasets or Copying Datasets to Amazon S3.

8. “BitTorrent” means the peer-to-peer file sharing protocol of the same name, as originally specified in [https://bittorrent.org/beps/bep\\_0003.html](https://bittorrent.org/beps/bep_0003.html), and implemented by LibTorrent.

9. “Communications” means oral or written communications of any kind, communicated directly or indirectly, including, without limitation inquiries, complaints, discussions, conversations,

1 negotiations, agreements, meetings, interviews, telephone conversations, letters, correspondences,  
2 memoranda, notes, telegrams, facsimiles, electronic mail (e-mail) messages and attachments, instant or  
3 direct messages (including but not limited to SMS messages, text messages, Apple iMessages, Slack  
4 messages, Teams messages), memoranda, documents, writings, or other forms of communications. The  
5 term “Communications” Includes instances where one party disseminates information that the other party  
6 receives but does not respond to.

7 10. “Complaint” refers to the operative complaint at the time documents are produced in  
8 response to these requests. At the time of service, the currently operative Complaint is Plaintiffs’ Third  
9 Amended Consolidated Complaint. ECF No. 407.

10 11. “Concerning,” whether capitalized or not, refers to and includes “constituting,”  
11 “evidencing,” “supporting,” “regarding,” “mentioning,” “reflecting,” “concerning,” “relating to,”  
12 “referring to,” “pertaining to,” “alluding to,” “responding to,” “proving,” “discussing,” “assessing,”  
13 “disproving,” “connected with,” “commenting on,” “about,” “showing,” “describing,” and/or logically or  
14 factually dealing with the matter described in the request in which the term appears.

15 12. “Data” means content, files, information, metadata, software, or any other digital material  
16 including Documents.

17 13. “Dataset(s)” means data Downloaded from Shadow Libraries.

18 14. “Default configuration” means the setting values adopted by the LibTorrent when the  
19 developer does not include code to change such values.

20 15. “Destroyed” means deleted, overwritten, or otherwise not retained or preserved.

21 16. “Document” is used in its broadest sense allowed by Rule 34(a) of the Federal Rules of  
22 Civil Procedure and includes, but is not limited to, any writings, drawings, graphs, handwriting,  
23 typewriting, printing, photostatting, photographing, photocopying, transmitting by electronic mail, instant  
24 message, text message, or facsimile, and every other means of recording upon any tangible thing, any form  
25 of communication or representation, including letters, words, pictures, sounds, or symbols, or combinations  
26 thereof, and any record thereby created, regardless of the manner in which the record has been stored.

27 This Includes:  
28

a. The originals, drafts, and all non-identical copies thereof, whether different from the original by reason of any notation made on such copies or otherwise;

b. Booklets, brochures, pamphlets, circulars, notices, periodicals, papers, contracts, agreements, photographs, minutes, memoranda, messages, instant messages, text messages, appraisals, analyses, reports, financial calculations and representations, invoices, accounting and diary entries, inventory sheets, diaries, appointment books or calendars, teletypes, telefaxes, thermafaxes, ledgers, trial balances, correspondence, telegrams, press releases, advertisements, notes, working papers, drawings, schedules, tabulations, projections, information or programs stored in a computer (whether or not ever printed out or displayed), and all drafts, alterations, modifications, changes or amendments of any of the foregoing;

c. Graphic or aural representations of any kind, including, without limitation, photographs, microfiche, microfilm, videotapes, recordings, drawings, charts and motion pictures;

d. All letters, words, pictures, sounds, or symbols, or combinations thereof stored in or on any electronic, mechanical, magnetic, or optical device including, but not limited to: (i) computer data storage devices (servers, laptops hard-drives, flash drives, discs, magnetic cards, and the like), (ii) the internet or “the Cloud” (such as e-mail, web posts, social media posts, internet pages, etc.), and (iii) information stored on cell phones.

17. “Download” and its variations means to acquire files by digital transfer to a location under a user’s control, and includes torrenting (*i.e.*, using software implementing the BitTorrent protocol to acquire files). When in reference to a .torrent file, Downloading a Torrent means acquiring the Torrent Payload for the .torrent file.

18. “File(s)” means one or more pieces of data.

19. The “Fourteen Torrent Files Missing Corresponding Parquets” means the following files:  
 annas\_archive\_data\_\_aacid\_\_ia2\_acsmpdf\_files\_\_20231008T203648Z--20231008T203649Z.torrent;  
 annas\_archive\_data\_\_aacid\_\_ia2\_acsmpdf\_files\_\_20231008T234052Z--20231008T234053Z.torrent;

annas\_archive\_data\_\_aacid\_\_ia2\_acsmpdf\_files\_\_20231008T234134Z--20231008T234135Z.torrent;  
 annas\_archive\_data\_\_aacid\_\_ia2\_acsmpdf\_files\_\_20231008T234141Z--20231008T234142Z.torrent;  
 annas\_archive\_data\_\_aacid\_\_ia2\_acsmpdf\_files\_\_20231008T234149Z--20231008T234150Z.torrent;  
 annas\_archive\_data\_\_aacid\_\_ia2\_acsmpdf\_files\_\_20231009T010136Z--20231009T010137Z.torrent;  
 annas\_archive\_data\_\_aacid\_\_ia2\_acsmpdf\_files\_\_20231009T020926Z--20231009T020927Z.torrent;  
 annas\_archive\_data\_\_aacid\_\_ia2\_acsmpdf\_files\_\_20231009T022118Z--20231009T022119Z.torrent;  
 annas\_archive\_data\_\_aacid\_\_ia2\_acsmpdf\_files\_\_20231009T022632Z--20231009T022633Z.torrent;  
 annas\_archive\_data\_\_aacid\_\_ia2\_acsmpdf\_files\_\_20231009T023816Z--20231009T023817Z.torrent;  
 annas\_archive\_data\_\_aacid\_\_ia2\_acsmpdf\_files\_\_20231009T025443Z--20231009T025444Z.torrent;  
 annas\_archive\_data\_\_aacid\_\_ia2\_acsmpdf\_files\_\_20231009T033545Z--20231009T033546Z.torrent;  
 annas\_archive\_data\_\_aacid\_\_ia2\_acsmpdf\_files\_\_20231009T034121Z--20231009T034122Z.torrent;  
 annas\_archive\_data\_\_aacid\_\_ia2\_acsmpdf\_files\_\_20231009T034647Z--20231009T034648Z.torrent.

20. The “Fifteen ZLib2 Torrent Files” means the following files:

pilimi-zlib2-17470000-17599999.torrent;  
 pilimi-zlib2-18130000-18209999.torrent;  
 pilimi-zlib2-18210000-18319999.torrent;  
 pilimi-zlib2-18320000-18399999.torrent;  
 pilimi-zlib2-18610000-18699999.torrent;  
 pilimi-zlib2-18810000-19019999.torrent;  
 pilimi-zlib2-21080000-21179999.torrent;  
 pilimi-zlib2-21320000-21399999.torrent;  
 pilimi-zlib2-21590000-21689999.torrent;  
 pilimi-zlib2-21800000-21839999.torrent;  
 pilimi-zlib2-22020000-22049999.torrent;  
 pilimi-zlib2-22050000-22069999.torrent;  
 pilimi-zlib2-22070000-22099999.torrent;  
 pilimi-zlib2-22100000-22119999.torrent;

1 pilimi-zlib2-22200000-22299999.torrent

2 21. The “113 IA2 and ZLib3 Files” means the following files:

3 annas\_archive\_data\_\_aacid\_\_ia2\_acsmpdf\_files\_\_20231008T234032Z--20231008T234033Z.torrent;  
 4 annas\_archive\_data\_\_aacid\_\_ia2\_acsmpdf\_files\_\_20231008T234103Z--20231008T234104Z.torrent;  
 5 annas\_archive\_data\_\_aacid\_\_ia2\_acsmpdf\_files\_\_20231008T234230Z--20231008T234231Z.torrent;  
 6 annas\_archive\_data\_\_aacid\_\_ia2\_acsmpdf\_files\_\_20231008T234244Z--20231008T234245Z.torrent;  
 7 annas\_archive\_data\_\_aacid\_\_ia2\_acsmpdf\_files\_\_20231008T234315Z--20231008T234316Z.torrent;  
 8 annas\_archive\_data\_\_aacid\_\_ia2\_acsmpdf\_files\_\_20231008T234332Z--20231008T234333Z.torrent;  
 9 annas\_archive\_data\_\_aacid\_\_ia2\_acsmpdf\_files\_\_20231009T031205Z--20231009T031206Z.torrent;  
 10 annas\_archive\_data\_\_aacid\_\_ia2\_acsmpdf\_files\_\_20240126T082259Z--20240126T082300Z.torrent;  
 11 annas\_archive\_data\_\_aacid\_\_ia2\_acsmpdf\_files\_\_20240126T082309Z--20240126T082310Z.torrent;  
 12 annas\_archive\_data\_\_aacid\_\_ia2\_acsmpdf\_files\_\_20240126T082313Z--20240126T082314Z.torrent;  
 13 annas\_archive\_data\_\_aacid\_\_ia2\_acsmpdf\_files\_\_20240126T082320Z--20240126T082321Z.torrent;  
 14 annas\_archive\_data\_\_aacid\_\_ia2\_acsmpdf\_files\_\_20240126T082328Z--20240126T082329Z.torrent;  
 15 annas\_archive\_data\_\_aacid\_\_ia2\_acsmpdf\_files\_\_20240126T082336Z--20240126T082337Z.torrent;  
 16 annas\_archive\_data\_\_aacid\_\_ia2\_acsmpdf\_files\_\_20240126T082345Z--20240126T082346Z.torrent;  
 17 annas\_archive\_data\_\_aacid\_\_ia2\_acsmpdf\_files\_\_20240126T082355Z--20240126T082356Z.torrent;  
 18 annas\_archive\_data\_\_aacid\_\_ia2\_acsmpdf\_files\_\_20240126T082419Z--20240126T082420Z.torrent;  
 19 annas\_archive\_data\_\_aacid\_\_ia2\_acsmpdf\_files\_\_20240126T082425Z--20240126T082426Z.torrent;  
 20 annas\_archive\_data\_\_aacid\_\_ia2\_acsmpdf\_files\_\_20240126T082432Z--20240126T082433Z.torrent;  
 21 annas\_archive\_data\_\_aacid\_\_ia2\_acsmpdf\_files\_\_20240126T082437Z--20240126T082438Z.torrent;  
 22 annas\_archive\_data\_\_aacid\_\_ia2\_acsmpdf\_files\_\_20240126T082443Z--20240126T082444Z.torrent;  
 23 annas\_archive\_data\_\_aacid\_\_ia2\_acsmpdf\_files\_\_20240126T082448Z--20240126T082449Z.torrent;  
 24 annas\_archive\_data\_\_aacid\_\_ia2\_acsmpdf\_files\_\_20240126T082453Z--20240126T082454Z.torrent;  
 25 annas\_archive\_data\_\_aacid\_\_ia2\_acsmpdf\_files\_\_20240126T082459Z--20240126T082500Z.torrent;  
 26 annas\_archive\_data\_\_aacid\_\_ia2\_acsmpdf\_files\_\_20240126T082503Z--20240126T082504Z.torrent;  
 27 annas\_archive\_data\_\_aacid\_\_ia2\_acsmpdf\_files\_\_20240126T082509Z--20240126T082510Z.torrent;

1 annas\_archive\_data\_\_aacid\_\_ia2\_acsmpdf\_files\_\_20240126T082518Z--20240126T082519Z.torrent;  
2 annas\_archive\_data\_\_aacid\_\_ia2\_acsmpdf\_files\_\_20240126T082525Z--20240126T082526Z.torrent;  
3 annas\_archive\_data\_\_aacid\_\_ia2\_acsmpdf\_files\_\_20240126T082531Z--20240126T082532Z.torrent;  
4 annas\_archive\_data\_\_aacid\_\_ia2\_acsmpdf\_files\_\_20240126T082538Z--20240126T082539Z.torrent;  
5 annas\_archive\_data\_\_aacid\_\_ia2\_acsmpdf\_files\_\_20240126T082548Z--20240126T082549Z.torrent;  
6 annas\_archive\_data\_\_aacid\_\_ia2\_acsmpdf\_files\_\_20240126T082556Z--20240126T082557Z.torrent;  
7 annas\_archive\_data\_\_aacid\_\_ia2\_acsmpdf\_files\_\_20240126T082607Z--20240126T082608Z.torrent;  
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9 annas\_archive\_data\_\_aacid\_\_ia2\_acsmpdf\_files\_\_20240126T082638Z--20240126T082639Z.torrent;  
10 annas\_archive\_data\_\_aacid\_\_ia2\_acsmpdf\_files\_\_20240126T082647Z--20240126T082648Z.torrent;  
11 annas\_archive\_data\_\_aacid\_\_ia2\_acsmpdf\_files\_\_20240126T082658Z--20240126T082659Z.torrent;  
12 annas\_archive\_data\_\_aacid\_\_ia2\_acsmpdf\_files\_\_20240126T082707Z--20240126T082708Z.torrent;  
13 annas\_archive\_data\_\_aacid\_\_ia2\_acsmpdf\_files\_\_20240126T082727Z--20240126T082728Z.torrent;  
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19 annas\_archive\_data\_\_aacid\_\_zlib3\_files\_\_20240402T051953Z--20240402T051954Z.torrent;  
20 annas\_archive\_data\_\_aacid\_\_zlib3\_files\_\_20240402T052138Z--20240402T052139Z.torrent;  
21 annas\_archive\_data\_\_aacid\_\_zlib3\_files\_\_20240402T052344Z--20240402T052345Z.torrent;  
22 annas\_archive\_data\_\_aacid\_\_zlib3\_files\_\_20240402T052815Z--20240402T052816Z.torrent;  
23 annas\_archive\_data\_\_aacid\_\_zlib3\_files\_\_20240402T053135Z--20240402T053136Z.torrent;  
24 annas\_archive\_data\_\_aacid\_\_zlib3\_files\_\_20240402T053504Z--20240402T053505Z.torrent;  
25 annas\_archive\_data\_\_aacid\_\_zlib3\_files\_\_20240402T053851Z--20240402T053852Z.torrent;  
26 annas\_archive\_data\_\_aacid\_\_zlib3\_files\_\_20240402T054426Z--20240402T054427Z.torrent;  
27 annas\_archive\_data\_\_aacid\_\_zlib3\_files\_\_20240402T054900Z--20240402T054901Z.torrent;

1 annas\_archive\_data\_\_aacid\_\_zlib3\_files\_\_20240402T055406Z--20240402T055407Z.torrent;  
 2 annas\_archive\_data\_\_aacid\_\_zlib3\_files\_\_20240402T182240Z--20240402T182241Z.torrent;  
 3 annas\_archive\_data\_\_aacid\_\_zlib3\_files\_\_20240402T182759Z--20240402T182800Z.torrent;  
 4 annas\_archive\_data\_\_aacid\_\_zlib3\_files\_\_20240402T182849Z--20240402T182850Z.torrent;  
 5 annas\_archive\_data\_\_aacid\_\_zlib3\_files\_\_20240402T182936Z--20240402T182937Z.torrent;  
 6 annas\_archive\_data\_\_aacid\_\_zlib3\_files\_\_20240402T183014Z--20240402T183015Z.torrent;  
 7 annas\_archive\_data\_\_aacid\_\_zlib3\_files\_\_20240402T183036Z--20240402T183037Z.torrent;

8 22. “Identify” (and variations thereof) means:

9 a. With respect to a natural person, provide the person’s: (i) full name; (ii) current or  
 10 last known home address; (iii) current or last known business address; (iv) current or last  
 11 known email address; (v) current or last known occupation, employer and business position  
 12 or title; and (vi) current or last known telephone number.

13 b. With respect to an entity which is not a natural person, provide: (i) the full name of  
 14 the entity; (ii) the type of entity (e.g., corporation, partnership, sole proprietorship,  
 15 association); (iii) the name, address and telephone number of its principal place of business;  
 16 (iv) all names under which it is doing, or has ever done, business; (v) the names of the  
 17 contact person; and (vi) the date or interval when such entity stood in the capacity referenced  
 18 by the request.

19 c. With respect to an event or action, (i) provide the date of the event or action; (ii)  
 20 state the person(s) present or involved; (iii) state the place or places where the event or  
 21 action took place.

22 d. With respect to a Document, (i) state the originator, author, addressee, recipient;  
 23 (ii) describe the contents; (iii) state the date of the document; and (iv) identify all Persons  
 24 with knowledge of any of the foregoing.

25 e. With respect to a fact, means to (i) describe the fact; (ii) state when it became  
 26 known to Meta; (iii) identify the source from which Meta learned the fact; and (iv) identify  
 27 the Documents that record, show or refer to the fact.  
 28

1           23.     “Including” and “includes,” whether capitalized or not, are used to provide examples of  
2 certain types of information and should not be construed as limiting a request or definition in any way. The  
3 terms “including” and “includes” shall be construed as if followed by the phrase “but not limited to.”

4           24.     “IA2” means the incremental new releases of Internet Archive Digital Lending books hosted  
5 by Anna’s Archive that use the Anna’s Archive Containers (AAC) format.

6           25.     “Internet Archive” means the Dataset of textual works of that name, which is also referred  
7 to as “IA Controlled Digital Lending”, or any part of it.

8           26.     “lcpdf Collection” means the portion of the Internet Archive Dataset identified by torrent  
9 files with “lcpdf” in the torrent file name, or any part of it.

10          27.     “LibTorrent” means the peer-to-peer file-sharing implementation of BitTorrent of that  
11 name.

12          28.     “LibGen” means the Dataset of textual works known as Library Genesis or LibGen, or any  
13 part of it, from the libgen.rs collection, libgen.li collection, or any other collection identified as LibGen.

14          29.     “LibGen Fiction” means the Dataset of textual works of that name, or any part of it.

15          30.     “LibGen SciTech” means the Dataset of textual works known as LibGen SciTech or LibGen  
16 Non-Fiction, or any part of it.

17          31.     “LibGen SciMag” means the Dataset of textual works of that name, or any part of it.

18          32.     “Meta” means Meta Platforms, Inc., and its employees, agents, attorneys, accountants,  
19 representatives, predecessors or successors-in-interest, any corporation or partnership under its direction,  
20 or any other person or entity acting on its behalf or under its control.

21          33.     “Person” means any natural person or any business, legal, or governmental entity or  
22 association.

23          34.     “PiLiMi” means the Dataset of textual works known as “Pirate Library Mirror” or “PiLiMi,”  
24 or any part of it.

25          35.     “PySpark” means the application programming interface of that name.

26          36.     “PySpark Cluster” means the collection of AWS servers, physical or virtual, where Meta  
27 engineers ran their torrenting code that used PySpark.

1 37. “Relevant Period” includes and encompasses all times relevant to the acts and failures to  
2 act which are relevant to the Complaint.

3 38. “Shadow Library” means any textual Dataset, or any part of a textual Dataset, available for  
4 Download on the Internet that includes copyrighted works, including Anna’s Archive, Duxiu, the Internet  
5 Archive, LibGen, LibGen Fiction, LibGen SciTech, LibGen SciMag, PiLiMi, Sci-Hub, or Z-Library.

6 39. “Dedicated AWS Virtual Computers” means the six dedicated cloud-computing EC2  
7 instances You used to Download any part of Anna’s Archive in 2024.

8 40. “Train” or “Training” refers to any process or method used to develop, improve, or refine a  
9 machine-learning model. This includes, but is not limited to, feeding data into the model, adjusting  
10 algorithms, optimizing parameters, and testing, validating, and updating models. It also includes the selection,  
11 preparation, and use of Datasets, the execution of supervised, unsupervised, or reinforcement learning  
12 techniques, and any pre-processing steps, model tuning, cross-validation, and performance evaluations.

13 41. “Sci-Hub” means the Dataset of textual works of that name, or any part of it.

14 42. “Torrent” and its variations means peer-to-peer file sharing in which users download/upload  
15 pieces of digital files from/to multiple different users (peers) in a network simultaneously.

16 43. “Torrented Data” means data acquired via torrenting of Shadow Libraries in 2024.

17 44. “Torrent Payload” means data acquired via torrenting using a specific .torrent file.

18 45. “Upload” and its variations, in the context of torrenting, means transferring file data from  
19 Meta-controlled servers to peer-to-peer network users.

20 46. “You”, “Your”, and “Meta Platforms” shall mean Defendants Meta Platforms, Inc., its  
21 subsidiaries, affiliates, divisions, predecessors in interest, successors, or assignees, and their respective  
22 officers, directors, employees, consultants, representatives, and agents.

23 47. “Z-Library” means any or all of the Z-Library collections collaboratively managed by  
24 Anna’s Archive, including all releases of ZLib, ZLib2, or ZLib3.

25 48. “ZLib” means the Dataset of textual works identified by the name “zlib,” “Pirate Library  
26 Mirror,” or “pilimi,” or any part of it.  
27  
28



1 8. Any request set forth below to which there has not been an adequate and timely response  
2 may be deemed admitted and, therefore, conclusively established for purposes of this action.

3 **REQUESTS FOR ADMISSIONS**

4 **REQUEST FOR ADMISSION NO. 99**

5 Admit that You used LibTorrent in 2024 to Download one or more files from Anna's Archive.

6 **REQUEST FOR ADMISSION NO. 100**

7 Admit that You used LibTorrent in 2024 to Download one or more files from LibGen.

8 **REQUEST FOR ADMISSION NO. 101**

9 Admit that You used LibTorrent in 2024 to Download one or more files from LibGen Fiction.

10 **REQUEST FOR ADMISSION NO. 102**

11 Admit that You used LibTorrent in 2024 to Download one or more files from LibGen SciTech.

12 **REQUEST FOR ADMISSION NO. 103**

13 Admit that You used LibTorrent in 2024 to Download one or more files from LibGen SciMag.

14 **REQUEST FOR ADMISSION NO. 104**

15 Admit that You used LibTorrent in 2024 to Download one or more files from the Internet Archive's  
16 "ia" collection.

17 **REQUEST FOR ADMISSION NO. 105**

18 Admit that You used LibTorrent in 2024 to Download one or more files from the Internet Archive's  
19 "ia2" collection.

20 **REQUEST FOR ADMISSION NO. 106**

21 Admit that You used LibTorrent in 2024 to Download one or more files from the Internet Archive  
22 in "acsm" format."

23 **REQUEST FOR ADMISSION NO. 107**

24 Admit that You used LibTorrent in 2024 to Download one or more files from the Internet Archive  
25 in "lcpdf" format."

26 **REQUEST FOR ADMISSION NO. 108**

27 Admit that You used LibTorrent in 2024 to Download one or more files from ZLib.  
28

1 **REQUEST FOR ADMISSION NO. 109**

2 Admit that You used LibTorrent in 2024 to Download one or more files from ZLib2.

3 **REQUEST FOR ADMISSION NO. 110**

4 Admit that You used LibTorrent in 2024 to Download one or more files from ZLib3.

5 **REQUEST FOR ADMISSION NO. 111**

6 Admit that You did not change the default configurations of LibTorrent that control automatic  
7 uploading of data to interested peers while Torrenting when you used LibTorrent to Download one or more  
8 files from Shadow Libraries in 2024.

9 **REQUEST FOR ADMISSION NO. 112**

10 Admit that, in every instance when you used LibTorrent to Download one or more files from  
11 Shadow Libraries in 2024, You did not change the default network configurations of LibTorrent that control  
12 automatic uploading of data to interested peers while Torrenting.

13 **REQUEST FOR ADMISSION NO. 113**

14 Admit that, after Downloading Torrented Data in 2024, You copied all Torrented Data to an Amazon  
15 S3 directory in the s3://fairspark-data Amazon S3 Bucket.

16 **REQUEST FOR ADMISSION NO. 114**

17 Admit that You Downloaded all Torrented Data in 2024 using AWS Virtual Computers.

18 **REQUEST FOR ADMISSION NO. 115**

19 Admit that all Internet Archive data You Downloaded from Anna's Archive in 2024 was  
20 Downloaded between April and June 2024, inclusive.

21 **REQUEST FOR ADMISSION NO. 116**

22 Admit that You used Dedicated AWS Virtual Computers to Download all of the Internet Archive  
23 data You torrented in 2024.

24 **REQUEST FOR ADMISSION NO. 117**

25 Admit that You copied the corresponding ".tar" files for the Anna's Archive data You Downloaded  
26 in 2024 to the Amazon S3 path s3://fairspark-data/data/annas\_archive/internet\_archive/data.



1       **REQUEST FOR ADMISSION NO. 118**

2           Admit that the corresponding “.tar” files for the Anna’s Archive data You Downloaded in 2024 were  
3   untarred in April and June 2024.

4       **REQUEST FOR ADMISSION NO. 119**

5           Admit that You stored the corresponding digital book files for the Anna’s Archive data You  
6   Downloaded in 2024 in subdirectories of the Amazon S3 path s3://fairspark-data/  
7   data/annas\_archive/internet\_archive/data/.

8       **REQUEST FOR ADMISSION NO. 120**

9           Admit that You used the PySpark Cluster to Download all LibGen SciTech files You Downloaded  
10   in April 2024.

11       **REQUEST FOR ADMISSION NO. 121**

12           Admit that You stored all Libgen SciTech files You Downloaded in April 2024 at the Amazon S3  
13   path s3://fairspark-data/data/annas\_archive/libgen/data/.

14       **REQUEST FOR ADMISSION NO. 122**

15           Admit that You used the PySpark Cluster to Download all LibGen Fiction files You Downloaded  
16   in April 2024.

17       **REQUEST FOR ADMISSION NO. 123**

18           Admit that You stored all LibGen Fiction files You Downloaded in April 2024 at the Amazon S3  
19   path s3://fairspark-data/xiaolan/libgen\_rs\_fic/.

20       **REQUEST FOR ADMISSION NO. 124**

21           Admit that the files in the Amazon S3 directory s3://fairspark-data/xiaolan/libgen\_rs\_fic/ directory  
22   are copies of books in one or more digital formats.

23       **REQUEST FOR ADMISSION NO. 125**

24           Admit that You used the PySpark Cluster to Download all Z-Library files You Downloaded with  
25   Torrent Payloads smaller than 800 GB in April 2024.

1       **REQUEST FOR ADMISSION NO. 126**

2           Admit that You stored all Z-Library files You Downloaded in April 2024 at the Amazon S3 path  
3 s3://fairspark-data/data/annas\_archive/zlib/data/.

4       **REQUEST FOR ADMISSION NO. 127**

5           Admit that the files in the Amazon S3 directory s3://fairspark-data/data/annas\_archive/zlib/data/  
6 are copies of books in various digital formats or else are .tar files.

7       **REQUEST FOR ADMISSION NO. 128**

8           Admit that the individual book files in the Amazon S3 directory s3://fairspark-  
9 data/data/annas\_archive/zlib/data/ are data You Downloaded from Z-Library in .tar format, which You  
10 untarred.

11       **REQUEST FOR ADMISSION NO. 129**

12           Admit that all existing logs and metadata pertaining to the Torrented Data have been produced.

13       **REQUEST FOR ADMISSION NO. 130**

14           Admit that if any logs or metadata pertaining to Downloading the Torrented Data have not been  
15 produced, it is because the logs or metadata were Destroyed.

16       **REQUEST FOR ADMISSION NO. 131**

17           Admit that all of the approximately 27,000 instances included in the AWS usage logs produced on  
18 September 12, 2025, correspond to the PySpark Cluster.

19       **REQUEST FOR ADMISSION NO. 132**

20           Admit that all of the approximately 27,000 instances included in the AWS usage logs produced on  
21 September 12, 2025, were used for Torrenting.

22       **REQUEST FOR ADMISSION NO. 133**

23           Admit that, all PySpark Cluster instances for Torrenting were included in the AWS usage logs  
24 produced on September 12, 2025.

25       **REQUEST FOR ADMISSION NO. 134**

26           Admit that Meta did not preserve records indicating which instances in the AWS usage logs  
27 produced on September 12, 2025 were used for Torrenting.

1 **REQUEST FOR ADMISSION NO. 135**

2 Admit that the Dedicated AWS Virtual Computers for which usage logs were produced in March  
3 2025 were not part of the PySpark Cluster.

4 **REQUEST FOR ADMISSION NO. 136**

5 Admit that You used the PySpark Cluster to Download one or more files from LibGen.

6 **REQUEST FOR ADMISSION NO. 137**

7 Admit that You used the PySpark Cluster to Download one or more files from Internet Archive.

8 **REQUEST FOR ADMISSION NO. 138**

9 Admit that You used the PySpark Cluster to Download one or more files from Z-Library.

10 **REQUEST FOR ADMISSION NO. 139**

11 Admit that You began Downloading one or more files from Shadow Libraries via the PySpark  
12 Cluster on April 5, 2024.

13 **REQUEST FOR ADMISSION NO. 140**

14 Admit that You stopped Downloading files from Shadow Libraries via the PySpark Cluster on April  
15 19, 2024.

16 **REQUEST FOR ADMISSION NO. 141**

17 Admit that the “individual nodes downloading” mentioned in Meta\_Kadrey\_00237186 at -279  
18 corresponds to the Downloading on Dedicated AWS Virtual Computers for which AWS usage logs were  
19 produced in March 2025.

20 **REQUEST FOR ADMISSION NO. 142**

21 Admit that You used the Dedicated AWS Virtual Computers to Download the Torrented Data  
22 identified in the 38 rows listed in Meta\_Kadrey\_00161474 at Sheet1.

23 **REQUEST FOR ADMISSION NO. 143**

24 Admit that You started Downloading the Torrented Data identified in the 38 rows listed in  
25 Meta\_Kadrey\_00161474 at Sheet1 on April 5, 2024.

**REQUEST FOR ADMISSION NO. 144**

Admit that You manually copied to Amazon S3 the “.tar” files You Downloaded as Torrented Data identified in the 38 rows listed in Meta\_Kadrey\_00161474 at Sheet1.

**REQUEST FOR ADMISSION NO. 145**

Admit that You used code to copy to Amazon S3 the “.tar” files You Downloaded as Torrented Data identified in the 38 rows listed in Meta\_Kadrey\_00161474 at Sheet1.

**REQUEST FOR ADMISSION NO. 146**

Admit that line 35 of Meta\_Kadrey\_00161474 (“annas-archive-ia-acsm-t.tar.torrent”) was intended to refer to “annas-archive-ia-lcpdf-o.tar.torrent”.

**REQUEST FOR ADMISSION NO. 147**

Admit that You did not Download the entirety of the Torrent Payload for “annas-archive-ia-lcpdf-a.tar.torrent” referenced at line 14 of Meta\_Kadrey\_00161474.

**REQUEST FOR ADMISSION NO. 148**

Admit that You did not extract the .tar file for the file “annas-archive-ia-lcpdf-a.tar.torrent”.

**REQUEST FOR ADMISSION NO. 149**

Admit that when You extracted the .tar files for the file “annas-archive-ia-acsm-[letter].tar.torrent”, the files were placed into corresponding Amazon S3 paths named s3://fairspark-data/data/annas\_archive/internet\_archive/data/[same letter as in the .tar.torrent file name].

**REQUEST FOR ADMISSION NO. 150**

Admit that when You extracted the .tar files for the file “annas-archive-ia-lcpdf-[letter].tar.torrent”, the files were placed into the Amazon S3 path s3://fairspark-data/data/annas\_archive/internet\_archive/data/[same letter as in the .tar.torrent file name].

**REQUEST FOR ADMISSION NO. 151**

Admit that You Downloaded the Fourteen Torrent Files Missing Corresponding Parquets.

**REQUEST FOR ADMISSION NO. 152**

Admit that You started Downloading the Fourteen Torrent Files Missing Corresponding Parquets on April 5, 2024.

1       **REQUEST FOR ADMISSION NO. 153**

2           Admit that You Downloaded the Fourteen Torrent Files Missing Corresponding Parquets using the  
3 same code You used to Download other data on the PySpark Cluster.

4       **REQUEST FOR ADMISSION NO. 154**

5           Admit that the Fourteen Torrent Files Missing Corresponding Parquets totaled approximately 3.7  
6 TB.

7       **REQUEST FOR ADMISSION NO. 155**

8           Admit that Your Downloading of the Fourteen Torrent Files Missing Corresponding Parquets  
9 generated .parquet files associated with the Downloading.

10       **REQUEST FOR ADMISSION NO. 156**

11           Admit that the .parquet files associated with Your Downloading of the Fourteen Torrent Files  
12 Missing Corresponding Parquets are not in Your possession, custody, or control.

13       **REQUEST FOR ADMISSION NO. 157**

14           Admit that the .parquet files associated with Your Downloading of the Fourteen Torrent Files  
15 Missing Corresponding Parquets are not in Your possession, custody, or control because they were  
16 deleted.

17       **REQUEST FOR ADMISSION NO. 158**

18           Admit that You started Downloading the Fifteen ZLib2 Torrent Files on May 14, 2024.

19       **REQUEST FOR ADMISSION NO. 159**

20           Admit that You completed Downloading the Fifteen ZLib2 Torrent Files on May 30, 2024.

21       **REQUEST FOR ADMISSION NO. 160**

22           Admit that the Fifteen ZLib2 Torrent Files totaled approximately 7.3 TB.

23       **REQUEST FOR ADMISSION NO. 161**

24           Admit that You Downloaded the Fifteen ZLib2 Torrent Files using the Dedicated AWS Virtual  
25 Computers.

1       **REQUEST FOR ADMISSION NO. 162**

2           Admit that the .tar files associated with Your Downloading of the Fifteen ZLib2 Torrent Files are  
3 not in Meta’s possession, custody, or control.

4       **REQUEST FOR ADMISSION NO. 163**

5           Admit that the .tar files associated with Your Downloading of the Fifteen ZLib2 Torrent Files are  
6 not in Meta’s possession, custody, or control because they were deleted.

7       **REQUEST FOR ADMISSION NO. 164**

8           Admit that You named the 113 IA2 and ZLib3 Files using the format “pilimi-zlib2-[number]-  
9 [number].torrent”, where “[number]-[number]” corresponds to a numeric range in the torrent file name  
10 (e.g., “22200000-22299999”).

11       **REQUEST FOR ADMISSION NO. 165**

12           Admit that You started Downloading the 113 IA2 and ZLib3 Files on June 10, 2024.

13       **REQUEST FOR ADMISSION NO. 166**

14           Admit that You completed Downloading the 113 IA2 and ZLib3 files on June 15, 2024.

15       **REQUEST FOR ADMISSION NO. 167**

16           Admit that the 113 IA2 and ZLib3 Files totaled approximately 29.2 TB.

17       **REQUEST FOR ADMISSION NO. 168**

18           Admit that You Downloaded the 113 IA2 and ZLib3 Files using the Dedicated AWS Virtual  
19 Computers.

20       **REQUEST FOR ADMISSION NO. 169**

21           Admit that You used LibTorrent in 2024 to Download one or more files from Duxiu.

22       **REQUEST FOR ADMISSION NO. 170**

23           Admit that You used LibTorrent to Download one or more files from Anna’s Archive after July  
24 31, 2024.

Dated: October 29, 2025

By: /s/ Maxwell V. Pritt  
Maxwell V. Pritt

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**CERTIFICATE OF SERVICE**

I, the undersigned, am employed by Boies Schiller Flexner, LLP. My business address is 1401 New York Avenue NW, Washington, DC 20005. I am over the age of eighteen and not a party to this action.

On October 29, 2025, I caused the following documents to be served by email upon the parties listed on the attached Service List:

- **PLAINTIFFS' THIRD SET OF REQUESTS FOR ADMISSIONS TO DEFENDANT META PLATFORMS, INC.**

I declare under penalty of perjury that the foregoing is true and correct. Executed October 29, 2025.

/s/ Jay Schuffenhauer

Jay Schuffenhauer

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